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September 9, 2021

**VIA ECF AND E-MAIL (LHG\_ORDERS@NJD.USCOURTS.GOV)**

Hon. Lois H. Goodman, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: In re Valeant Pharmaceuticals International, Inc. Securities Litigation**  
**Civil Action No. 3:15-cv-07658 (MAS) (LHG)**

Dear Judge Goodman:

On behalf of Defendant Tanya Carro ("Defendant"), I enclose a copy of the following:

1. Declaration of Richard Hernandez in support of Application for *Pro Hac Vice* Admission;
2. Declaration of Patrick J. Hayden in support of Application for *Pro Hac Vice* Admission;
3. Proposed Form of Consent Order; and
4. Certification of Service.

Defendant submits this application with the consent of counsel for Plaintiffs. If Your Honor finds the enclosed proposed Consent Order acceptable, we respectfully request that it be entered.

Respectfully submitted,

/s/ Richard Hernandez

Richard Hernandez

Enclosures

cc: Counsel of Record (via ECF)